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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WHIRLYBIRD HELICOPTERS, LLC,

Defendant.

Case No. 1:15-cv-00093-BCW

**MOTION FOR CLERK'S ENTRY OF
DEFAULT**

Judge Brooke C. Wells

Under FED. R. CIV. P. 55(a) and 55(b)(1), the United States of America, through the undersigned Assistant United States Attorney, hereby requests entry of default against Defendant in the amount of \$55,125.00 for its failure to answer or otherwise defend against this action. In support of this Motion, the United States provides the following facts:

1. The complaint in this matter was filed on July 23, 2015. Docket No. 2.
2. Defendant was served with a copy of the summons and complaint on October 24, 2015, as reflected on the docket sheet by the waiver of service filed on November 9, 2015. Docket No. 4.
3. An answer to the complaint was due on January 4, 2016. Docket No. 5.

4. Defendant has failed to appear, plead or otherwise defend within the time allowed and, therefore, is now in default.

WHEREFORE, the United States prays that the Clerk of the Court enter default judgment against Defendant in the amount of \$55,125.00.

Dated April 15, 2016.

/s/ Amanda A. Berndt
AMANDA A. BERNDT
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the United States Attorney's Office for the District of Utah, and that a true and accurate copy of the foregoing MOTION FOR ENTRY OF DEFAULT JUDGMENT was sent via United States mail to all parties named below on the 15th day of April, 2016.

Adam Wilkerson, CEO
Whirlybird Helicopters, LLC
2478 South 5175 West
Roy, UT 84067

/s/ Amanda A. Berndt
AMANDA A. BERNDT
Assistant U.S. Attorney